

UNITED STATES DISTRICT COURT
FOR THE DISTRICT OF PUERTO RICO

In re:

THE FINANCIAL OVERSIGHT AND
MANAGEMENT BOARD FOR PUERTO RICO, : PROMESA
as representative of : Title III
THE COMMONWEALTH OF PUERTO RICO *et al.*, : Case No. 17-BK-3283 (LTS)
Debtors.¹ : (Jointly Administered)

**ASOCIACIÓN DE MAESTROS DE PUERTO RICO AND ASOCIACIÓN DE
MAESTROS DE PUERTO RICO-LOCAL SINDICAL'S MOTION FOR LEAVE TO
REQUEST SUBSTITUTION OF ATTACHMENT FILED IN ERROR AT DOCKET NO.
18757 FOR ATTACHMENT FILED AT DOCKET NO. 19031 AMPR'S PRETRIAL
INFORMATIVE MOTION OF OCTOBER 26, 2021**

Asociación de Maestros Puerto Rico and the Asociación de Maestros de Puerto Rico-Local Sindical (collectively, "AMPR"), by and through their undersigned counsel, hereby submit this Motion fo leave to substitute attachment filed in error at Docket No. 18757 for correct attachment filed at Docket No. 19031 AMPR's *Pretrial Informative Motion* in compliance with the Court's *Order regarding Procedures for Hearing on Confirmation of Plan of Adjustment* [Docket No. 18,502] and respectfully states as follow:

¹ The Debtors in these Title III cases, along with each Debtor's respective Title III case number listed as a bankruptcy case number due to software limitations and the last four (4) digits of each Debtor's federal tax identification number, as applicable, are the (i) Commonwealth of Puerto Rico (Bankruptcy Case No. 17-BK-3283 (LTS)) (Last Four Digits of Federal Tax ID: 3481), (ii) Employees Retirement System of the Government of the Commonwealth of Puerto Rico ("ERS") (Bankruptcy Case No. 17-BK-3566 (LTS)) (Last Four Digits of Federal Tax ID: 9686), (iii) Puerto Rico Highways and Transportation Authority ("HTA") (Bankruptcy Case No. 17-BK-3567 (LTS)) (Last Four Digits of Federal Tax ID: 3808), (iv) Puerto Rico Sales Tax Financing Corporation ("COFINA") (Bankruptcy Case No. 17-BK-3284 (LTS)) (Last Four Digits of Federal Tax ID: 8474), and (v) Puerto Rico Electric Power Authority ("PREPA") (Bankruptcy Case No. 17-4780 (LTS)) (Last Four Digits of Federal Tax ID: 3747).

1. The undersigned counsel intended and indeed filed on October 26, 2021 at Docket No. 18757 what was purported to be AMPR's Pretrial Informative Motion. However, by an involuntary omission the undersigned counsel attached to the filing at Docket no. 18757 the incorrect document. To wit, the attached document at Docket No. 18757 is AMPR's Objection to the Plan of Adjustment Confirmation, instead of AMPR's Pretrial Informative Motion (now filed at Docket No. 19031).
2. In light of the aforementioned omission by the undersigned counsel, AMPR herein respectfully request Leave of Court to substitute the document attached and incorporated at Docket No. 18757 (duplicative Objection of AMPR), for the correct document that needed to be attached and incorporated into Docket No. 18757, to wit, *AMPR's Pretrial Informative Motion. (Exhibit 1)*.
3. The undersigned became aware of this filing error, while consulting with counsel for the Oversight Board regarding AMPR's request for allocation of time for AMPR's Opening Statements during the November 8, 2021 Confirmation Hearing, Closing Statements and AMPR's request to be able to cross examine the Oversight Boards' witness, as requested in the Pretrial Informative Motion that AMPR intended to file on October 26, 2021, but that by omission of the undersigned, attached the incorrect document instead. As part of those discussions, AMPR submitted to the Oversight Board's counsel an un filed and now filed copy of *AMR's Pretrial Informative Motion*.
4. Given that parties have until November 4, 2021 to discuss with the Oversight Board the allocation of time for Opening Statements for the November 8, 2021 Confirmation Hearing and at this time no Agenda has been filed proposing the allocation of time for parties, AMPR's believes that there should be little to no prejudice to the Oversight Board or other

parties to the case from allowance of the present Motion for Leave to substitute the document attached and incorporated at Docket No. 18757 (duplicative Objection of AMPR), for the correct document to be attached and incorporated into Docket No.18757, AMPR's Pretrial Informative Motion and consequently for AMPR to be allowed time to present Opening Statements, Closing Statements and cross examine the Oversight Board's witness.

5. The leave requested herein is warranted given the importance of the matters being addressed in AMPR's Objection to Confirmation. To wit, the objection to confirmation of the Plan of Adjustment based on its proposal to freeze of the teacher's retirement plan. The freeze of the teacher's pensions, which is the main subject of AMPR's Objection is currently subject to an Omnibus Reply by the Oversight Board, as well as the approved notice to retirees and employees to file objections as to the Oversight Board's proposed findings as to the meaning of Act 53 of 2021. (Docket No. 19017). Given the relevance of whether AMPR's Objection to Confirmation of the Plan of Adjustment should be granted in whole or in part or denied in whole or in part, AMPR respectfully request that leave be granted so the parties to this main confirmation controversy may be fully heard at the Confirmation Hearing. (The Oversight Board's Omnibus Reply to Plan Objections characterize the freeze as necessary and essential in order to confirm the Plan of Adjustment (Docket No. 18874).
6. For the reasons stated above, AMPR respectfully request from the Honorable Court to grant AMPR's request for Leave of Court to substitute the document attached and incorporated at Docket No. 18757 (duplicative Objection of AMPR), for the correct document to be attached and incorporated into Docket No. 18757, AMPR's Pretrial Informative Motion and grant the relief requested therein, for AMPR to be able to present

Opening Statements, Closing Statements in support of its Objection to Confirmation and cross examine the Oversight Board's witness.

Respectfully submitted,

Date, November 3, 2021

/s/ José Luis Barrios Ramos

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